



"Daly, Matt"
<Matt.Daly@wesd.org>

04/03/2008 08:58 AM

To Daniel Duncan/R10/USEPA/US@EPA

cc Bruce Long/R10/USEPA/US@EPA, "Lee, Darren"
<Darren.Lee@wesd.org>, "McKay, David"
<David.McKay@wesd.org>, "Ron Lester"

bcc

Subject RE: South Lane School District PCB

Dan,

Yes, this PCB Remediation Project has been completed.

All the HID capacitors were intact; there were no leaks or spills to report. The capacitors and abatement materials were placed in the district's PCB storage drum, which was picked up by Waste Watch on February 28, 2008 and shipped to Clean Harbors in Aragonite, Utah. "40CFRPART761" was used as the Generator ID number.

We have not yet received the Certificate of Destruction.

Matt Daly • Project Manager • Willamette ESD
2611 Pringle Road SE • Salem, OR 97302
503-385-4693 • fax 503-540-2959
matt.daly@wesd.org

-----Original Message-----

From: Duncan.Daniel@epamail.epa.gov [mailto:Duncan.Daniel@epamail.epa.gov]

Sent: Wednesday, April 02, 2008 2:28 PM

To: Daly, Matt

Cc: Long.Bruce@epamail.epa.gov; Lee, Darren; McKay, David; Ron Lester

Subject: Re: South Lane School District PCB

Matt:

Has this South Lane County School District PCB Remediation been completed ?

From the Desk Of:

Daniel L. Duncan

Office of Compliance & Enforcement

(206) 553-6693

(206) 553-1775 (FAX)

"Daly, Matt"
<Matt.Daly@wesd.org>

02/19/2008 04:37
PM

To

Daniel Duncan/R10/USEPA/US@EPA,
Bruce Long/R10/USEPA/US@EPA

cc

"McKay, David"
<David.McKay@wesd.org>, "Lee,
Darren" <Darren.Lee@wesd.org>,
"Ron Lester"
<rl Lester2@lane.k12.or.us>

Subject
South Lane School District PCB

Dan Duncan,

I am the project manager for an HID lighting retrofit project at South Lane School District. We discovered that the HID capacitors recovered from this project potentially contain PCBs. The contractor has undergone our PCB training, the project's specifications cover PCB remediation, and the capacitors themselves are intact - however, since the PCBs were unexpected we had not required the contractor to have a PCB storage area prepared. We decided that the best course of action would be to place the capacitors in a drum in the school district's PCB storage, where the district stores ballasts replaced during the course of general maintenance.

The district does not yet have a TSCA number. The district is submitting its Notification of PCB Activity to the Fibers and Organics Branch in Washington, DC, and its PCB Remediation Plan to you in Seattle.

The contractor has arranged with a certified waste hauler to pick up the district's storage barrel next week for proper disposal. We do not expect the school district's TSCA number to arrive by that time, and in such a case would normally tell the district to use the "40 CFR 761" designation. However, because the barrel now contains waste from what might be considered two separate streams - the district's maintenance and the contractor - Darren Lee asked that I contact you and get approval or clarification to dispose of the capacitors in this way. Please let us know at your earliest convenience if this is an acceptable method for dealing with this situation; and if not, please suggest a more appropriate method.

Many thanks,

Matt Daly • Project Manager • Willamette ESD
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